



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

RECENT DECISIONS

ADVERSE POSSESSION—PUBLIC CORPORATIONS—WHETHER SUBJECT TO THE STATUTE OF LIMITATIONS.—The University of South Carolina was chartered by the Legislature, and has always been controlled and supported by the State. Certain lots were granted to it by the State as a part of this support. Later the City of Columbia was authorized to sell certain public lots in the city, which were not in use and were not held in trust by the State for any specific purpose. Under the authority to sell these lots. The City sold a certain lot which had been granted to the University, and for more than twenty years held the lot adversely to the University. The City claimed the land by adverse possession for the statutory period. *Held*, the statute of limitations can not be pleaded against the University. *Trustees of University of South Carolina v. City of Columbia* (S. C.), 93 S. S. 934. See NOTES, p. 209.

BILLS AND NOTES—DEFENSES—TRANSACTION OUT OF WHICH CONTRACT AROSE DECLARED ILLEGAL BY STATUTE.—The plaintiff was a bona fide holder for value of a negotiable note which had been given for services rendered by a physician. The physician was practicing without a certificate of qualification which was a violation of a criminal statute of the state. There was also a statute in effect which prohibited such physician from recovering compensation for his services. The plaintiff brought an action to recover on the note. *Held*, recovery is denied. *Whitehead v. Coker* (Ala.), 76 South. 484. See NOTES, p. 201.

BROKERS—RIGHT TO COMMISSION—PURCHASER "ABLE" TO BUY.—The plaintiff was employed by the defendant to sell certain real estate. The plaintiff found a buyer, who met with the defendant, but the parties failed to close the contract. At a later date, after the contract of agency had expired, the defendant entered into a binding contract with the person whom the plaintiff had introduced. The plaintiff sought to recover his commission, on the ground that he had found a customer ready, able and willing to buy. *Held*, to be "able" means that the purchaser must have the money at the time to make any cash payments that are required, and does not simply mean that the purchaser should have property upon which he could raise the amount of money necessary. *Reynor v. Mackrill* (Iowa), 164 N. W. 335.

It is generally agreed that to entitle a real estate broker to his commission he must procure a person, who is ready, able, and willing to purchase upon the terms specified by the principal. *Colburn v. Seymour*, 32 Colo. 430, 76 Pac. 1058, 2 Ann. Cas. 182. See 4 R. C. L. 307. And a broker who has found such a customer is entitled to his commission, even though the sale is afterwards consummated by the owner himself. *Smith v. Sharp*, 162 Ala. 433, 50 South. 381, 136 Am. St. Rep. 52. As to the owner's rights where he has granted an exclusive agency, see 2 VA. LAW REV. 618.